

Exhibit “I”

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

DELAGÉ LANDEN FINANCIAL SERVICES,
INC.,

Plaintiff,

TOSHIBA AMERICA MEDICAL SERVICES,
INC.,

Plaintiff/Intervenor,

VS.

NO. 02-02CV2810

DESOTO DIAGNOSTIC IMAGING, LLC,;
RANDON J. CARVEL; LYNN T. CARVEL;
DELTA RADIOLOGY, PC; AND ZOBAR
PROPERTIES, LLC,

Defendants.

DEPOSITION
OF
PAMELA PAULK
FEBRUARY 3, 2004

ALPHA REPORTING CORPORATION
Lisa Mayo, RMR, CRR
100 North Main Building, The Lobby
Memphis, Tennessee 38103
(901) 523-8974

1 question and she responded very quickly. I don't
2 know that the witness actually heard and
3 understood the question.

4 MS. PECK: Okay. Let me rephrase
5 that. And Kyle, I would ask that you just make
6 your objections and not have long drawn out
7 speaking objections.

8 BY MS. PECK:

9 Q. Did you find that the longer you used
10 the equipment, it locked up less frequently?

11 A. Yes, ma'am.

12 Q. And why was that?

13 A. I figured out what not to do to keep
14 it from locking up.

15 Q. Okay. And how would you describe your
16 overall experience with the CT? Did you feel it
17 was a good machine?

18 A. Yes. I enjoyed working on it after I
19 learned how to operate it and what not to do to
20 lock it up.

21 Q. Okay. Did you feel that it produced
22 good images?

23 A. Yes, ma'am.

24 Q. Okay. How did the images that the CT

1 produced compare to images that you were used to
2 seeing on the GE CT or the Picker CT that you had
3 used in the past?

4 A. They were compatible.

5 Q. Okay. How did the images -- well,
6 strike that.

7 How did your overall experience
8 with the Toshiba CT compare to your overall
9 experience with the GE and Picker CT that you had
10 used in the past?

11 A. It was compatible.

12 Q. Okay.

13 A. The software is a little harder to
14 use, but other than that, once you learn it, it's
15 a good piece of equipment.

16 Q. Okay. Now, at some point, the Toshiba
17 equipment was replaced with, I think you said a
18 Siemens CT?

19 A. Yes, ma'am.

20 Q. How did the images that were produced
21 on the Siemens CT compare to the images that were
22 produced on the Toshiba CT?

23 A. It was a faster machine, the Siemens
24 was. It had a bigger tube. It was

1 multidetector, so it's in a whole different
2 league.

3 Q. Okay. And how did that affect the
4 images that were produced?

5 A. It was a better piece of equipment,
6 but again, it was more expensive. It was
7 multidetector. The Toshiba was single.

8 Q. Okay.

9 A. Y'all have multidetectors. I'm sure
10 if that was a multidetector equipment I was
11 working on with a Toshiba, it would be, you know,
12 the same.

13 Q. Okay. Did you ever witness an
14 equipment malfunction on the CT that prevented a
15 patient's scan from being completed as scheduled?

16 A. Yes.

17 Q. Okay. How many times?

18 A. I could not tell you. I mean, I know
19 it locked up a few times in the middle of exams.
20 I cannot remember how many.

21 Q. Now, if it locked up, would the
22 patient go home or would you reboot and -- and
23 restart the scan?

24 A. I know we had occasions where the